Courtney Angeli, OSB No. 941765

E-mail: <a href="mailto:courtney@baaslaw.com">courtney@baaslaw.com</a>
Alysa M. Castro, OSB No. 163217

E-mail: alysa@baaslaw.com

BUCHANAN ANGELI ALTSCHUL

& SULLIVAN LLP

321 SW Fourth Avenue, Suite 600

Portland, Oregon 97204 Telephone: # 503.974.5015 Facsimile: # 971.230.0337 Of Attorneys for Plaintiff

#### IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF OREGON

## PORTLAND DIVISION

CASEY SCHAEFER,

Civil No. 3:17-cv-00769

Plaintiff,

v.

STIPULATED MOTION FOR ENTRY OF JUDGMENT AND DISMISSAL WITH PREJUDICE

ROYAL HAWAIIAN MACADAMIA NUT, INC., a corporation,

Defendant.

# Local Rule 7.1(a) Compliance

Pursuant to LR 7-1(a), counsel for plaintiff Casey Schaefer ("Mr. Schaefer" or "plaintiff") has conferred in good faith with defendant's counsel regarding the filing of this motion and the matters contained therein. Defendant's counsel has stipulated to the filing of this motion.

### **Motion**

Page 1 – STIPULATED MOTION FOR ENTRY OF JUDGMENT AND DISMISSAL WITH PREJUDICE

Plaintiff moves this court, with stipulation from defendant, to enter a judgment dismissing this action in its entirety, including all claims and counterclaims, with prejudice and without costs or fees to any party, and that no party is a prevailing party for any purpose.

| IT | 21 | SO | TZ  | IPI                           | ILA | TED: |
|----|----|----|-----|-------------------------------|-----|------|
| 11 | 10 |    | DI. | $\mathbf{u} \cdot \mathbf{v}$ |     | ILU. |

Dated this  $\frac{31}{2}$  day of July, 2017

Dated this 31 day of July, 2017

BUCHANAN ANGELI ALTSCHUL & SULLIVAN LLP

s/Courtney Angeli

Courtney Angeli, OSB # 941765

<u>courtney@baaslaw.com</u> Attorneys for Plaintiff SCHWABE WILLIAMSON & WYATT

Elizabeth Schleuning, OSB # 854276

eschleuning@schwabe.com Of Attorneys for Defendant

IT IS SO ORDERED:

DATED: \_\_\_\_\_\_, 2017.

HONORABLE JOLIE A. RUSSO U.S. District Court Judge

## **CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing STIPULATED MOTION FOR ENTRY OF JUDGMENT AND DISMISSAL WITH PREJUDICE on the following named person(s) on the date indicated below by:

| [  | Mailing with postage prepaid |  |  |  |  |
|--|------------------------------|--|--|--|--|
|  | CM/ECF                       |  |  |  |  |
|  | Hand-delivery                |  |  |  |  |
| [  | Overnight delivery           |  |  |  |  |
| [  | ] Email                      |  |  |  |  |
| to said person(s) a true copy thereof, addressed to his or her last-known address as indicated |                              |  |  |  |  |
| below.   |                              |  |  |  |  |

Elizabeth Schleuning
Schwabe Williamson & Wyatt
1211 SW Fifth Avenue Suite 1900
Portland, OR 97204
eschleuning@schwabe.com

Of Attorneys for defendant

DATED this 31st of July, 2017.

BUCHANAN ANGELI ALTSCHUL & SULLIVAN LLP

s/ Courtney Angeli

Courtney Angeli, OSB No. 941765 Alysa Castro, OSB No. 163217 Telephone: (503) 974-5015

Of Attorneys for plaintiff